

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

COACH, INC. and
COACH SERVICES, INC.,

Plaintiffs

VS.

TRENDY TEXAS, LLC, BAIG
MAHMOOD, AN INDIVIDUAL AND
MIRZA MOHAMMAD DAWOOD BAIG,

Defendants.

CV-NO: 4:16-cv-3150

**AFFIDAVIT OF JOHN R. NELSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR DISTRICT CLERK'S ENTRY OF
DEFAULT AGAINST DEFENDANT TRENDY TEXAS, LLC**

I, John R. Nelson, declare as follows:

1. I am an attorney licensed to practice before all of the courts in the State of Texas and admitted to practice before this Court. I am a partner in the law firm of Locke Lord LLP, attorneys of record for Plaintiffs Coach, Inc. and Coach Services, Inc. (“Plaintiffs”) in the above-entitled action. As the attorney at Locke Lord LLP with primary responsibility for the representation of Plaintiffs in this matter, I have personal knowledge of the facts set forth below, and if called as a witness, I could testify truthfully to those facts.

2. Plaintiffs filed their First Amended Complaint on April 12, 2017 against defendants Trendy Texas, LLC, Baig Mohammad, an individual, and Mirza Mohammad Dawood Baig, an individual. The First Amended Complaint alleged that Trendy Texas, LLC unlawfully duplicated, copied, distributed, imported, manufactured, exhibited and/or sold infringing purportedly Coach branded products.

3. Trendy Texas, LLC was served with the Summons and Amended Complaint on May 10, 2017.

4. To date, Defendant Trendy Texas, LLC has not pled in response to or otherwise defended against the First Amended Complaint, despite the passage of more than twenty (20) days since service. For this reason, Plaintiffs respectfully request, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, that the Clerk of this Court enter the default of Defendant Trendy Texas, LLC.

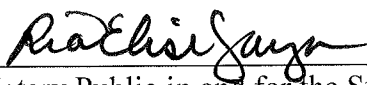
6. Upon information and belief, Trendy Texas, LLC is a Texas limited liability corporation and therefore is not currently on active duty in the United States military.

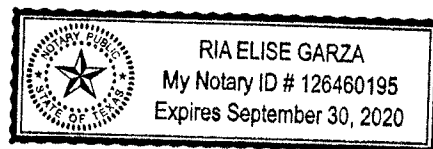
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 25th day of July, 2017.


John R. Nelson

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned notary public, on this the 25th day of July, 2017.


Notary Public in and for the State of Texas

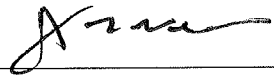


CERTIFICATE OF SERVICE

On the 25th day of July, 2017, I served a copy of the foregoing document on Trendy Texas, LLC by the method listed below:

VIA CERTIFIED MAIL

Mahmood Baig
Owner
Trendy Texas, LLC
7171 Harwin Drive, Suite 103
Houston, TX 77036



John R. Nelson